

Exhibit B

Affidavit (Docket 4912)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

)
In re:) Chapter 11
)
CELSIUS NETWORK LLC, *et al.*,) Case
No. 22-10964 (MG)
)
Debtors.) (Jointly Administered)
)

**AFFIDAVIT OF LAURA FALLER McNEIL IN SUPPORT OF FALLER CREDITORS'
MOTION SEEKING ENTRY OF AN ORDER (I) APPROVING FURTHER DISTRIBUTION
UNDER PLAN OF REORGANIZATION FOR CORPORATE CREDITORS AND
(II) GRANTING RELATED RELIEF**

STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

BEFORE ME, the undersigned authority, personally appeared Laura
Faller McNeil, who being first duly sworn states as follows:

1. I am the authorized representative for BFaller RD LLC, BFaller ROTH RD LLC, SFaller TRD RD LLC, and SFaller RD LLC (the "Faller Creditors"). I appeared before this Court on March 20, 2024 after filing docket #4719, which was a letter filed on behalf of over 80 corporate creditors for equitable distribution.

2. I manage these four corporate accounts for my parents, who hold their retirement accounts in single-member LLCs, thus they are considered corporate account holders. My parents, Bernard (73) and Sheri (72), are retired and put their entire life savings into these tax-sheltered accounts with Celsius under the pretenses their funds would be safe and secure. They worked hard for decades to accumulate these savings that they could use for their retirement and have not had access to these funds for almost two years. The unreasonable and untimely delay of distributions has been incredibly hard on all of us, not knowing when, if, or how much my parents would get back.

SARACHEK LAW
670 White Plains Rd, Ft. PI, Scarsdale, NY 10583 | P: (646) 517-5420

3. On January 19, 2024, my parents received emails for all four of their accounts from the Celsius Network Customer Care and Loans Expert email address which informed them that their four accounts were each one of the largest corporate creditors, and that only 100 corporate creditors would have the opportunity to receive their distributions in cryptocurrency. Since we were concerned about the uncertainty of receiving cryptocurrency on a timely basis and the delay with opening new accounts, my parents elected to receive US dollars. However, once distributions had still not been received on February 13, my parents requested their distributions be in cryptocurrency given the delay. They were told that they could not affirmatively select a distribution partner (i.e., Coinbase or Paypal) and only a limited number of corporate accounts would receive their distribution in cryptocurrency, and that all other corporate creditors would receive their distribution in US dollar distributions. Copies of those emails are attached hereto as Exhibit A. However, my parents did not timely receive the funds unlike other similarly situated creditors. They deserve to be treated fairly and equally to other creditors, especially within the same class. I have personal knowledge of the facts set forth in the Motion of the Faller Creditors (the "Motion").

4. Based on my review of my parents' claims, I calculate the impairment suffered by them is \$350,595.02.

5. My calculations are based on the following:

Claimant	Claim Value	Distribution Received Date	BTC Price on Distribution Received Date	ETH Price on Distribution Received Date	Fiat Value of BTC using Distribution Received Date Prices	Fiat Value of ETH using Distribution Received Date Prices	Total	Total With Interest ¹	Distribution Received	Shortfall
BFaller RD LLC	\$716,632.83	2/22/24 ²	\$ 70,083.05	\$ 3,998.83	\$ 356,462.55	\$ 304,639.15	\$661,101.70	\$666,462.96	\$414,733.89	\$251,729.07
BFaller ROTH RD LLC	\$118,029.08	4/22/24	\$ 67,233.96	\$ 3,236.66	\$ 56,322.50	\$ 40,610.86	\$96,933.36	\$98,675.50	\$68,042.64	\$30,632.86
SFaller RD LLC	\$118,124.38	4/22/24	\$ 67,233.96	\$ 3,236.66	\$ 56,367.98	\$ 40,643.65	\$97,011.63	\$98,755.18	\$68,097.58	\$30,657.60
SFaller TRD RD LLC	\$144,779.18	4/22/24	\$ 67,233.96	\$ 3,236.66	\$ 69,087.43	\$ 49,814.90	\$118,902.33	\$121,039.31	\$83,463.82	\$37,575.49
Total										\$350,595.02

¹ Interest rate based on www.irs.gov/payments/quarterly-interest-rates

² BFaller RD LLC had access to these funds on 3/8/24, so BTC and ETH prices are as of 3/8/24

6. For the aforementioned reasons, I am respectfully requesting that the Court order the Debtors to pay my parents an additional \$350,595.02.

SARACHEK LAW
670 White Plains Rd, Fl. PH, Scarsdale, NY 10583 | P: (646) 517-5420


Laura Faller McNeil

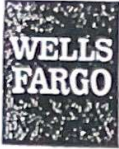
State of California
County of _____

Subscribed and sworn (or affirmed) before me on this _____ day
of May, 2024, by _____

_____, proved to me on the basis of
satisfactory evidence to be the person(s) who appeared before me.

(Seal)

Signature: please see wellsforgo attachment



Jurat Certificate California only

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara

Subscribed and sworn to (or affirmed) before me on this 30th

day of May, 2024, by Laura Faller Menail

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Place Seal Here

Signature



Description of Attached Document

Type or Title of Document

Affidavit of Laura Faller Menail

Document Date

05/30/2024

Number of Pages

3

Signer(s) Other Than Named Above

none

Exhibit A

Celsius Distribution Notices to Faller Creditors

[Celsius Network] Re: IMPORTANT: Celsius – Option for Corporate Creditors to Elect to Potentially Receive Distribution in Cryptocurrency

Celsius Network <support@celsius.network>

Fri, Jan 19, 2024 at 3:19 PM

Reply-To: Celsius Network <support@celsius.network>

To: "jake.faller.trad.ira@gmail.com" <jake.faller.trad.ira@gmail.com>

##- Please type your reply above this line -##

Your request ([#1395924](#)) has been updated. To add additional comments, reply to this email.**Customer Care and Loans Expert (Celsius Network)**

Jan 19, 2024, 23:19 UTC

Dear BFaller RD LLC,

This communication provides information about the distribution of cryptocurrency to you on account of Claims you may hold in the Celsius Chapter 11 proceedings. Please read the below in its entirety and timely provide Celsius with the information requested to complete the distribution of cryptocurrency to you on account of any such Claims.

You are receiving this communication because you have a claim (a "Claim") in the Chapter 11 proceedings of Celsius Network LLC and its debtor affiliates ("Celsius" or the "Debtors"), and you are one of the largest "corporate" creditors in this case.

Pursuant to the agreements the Debtors have with their distribution partners Coinbase and PayPal, the Debtors can only make distributions to 100 "corporate" creditors. A "corporate" creditor is any entity that is not an individual person (for example, a corporation, LLC, partnership, trust or similar entity). Whether a creditor qualifies as a "corporate" or "individual" creditor depends on Coinbase's policies and protocols.

As you may be aware, distributions pursuant to Celsius' modified Chapter 11 Plan of Reorganization [Docket No. 3577] (the "Plan") will commence on or around the Plan effective date (the "Effective Date"). **You are receiving this notification because you are one of the corporate creditors who has the largest claims against Celsius and, as such, you may have the opportunity to receive a cryptocurrency claim distribution through Coinbase.**

Celsius is reaching out to the corporate creditors with the largest claims to determine how to allocate these 100 slots. In order to be eligible to receive cryptocurrency, a corporate creditor must both:

- Affirmatively request to receive a distribution in cryptocurrency as described below by no later than **January 23, 2024**; AND
- If you have any Withdrawal Preference Exposure, elect to settle such Withdrawal Preference Exposure by no later than January 25, 2024 pursuant to the separate instructions you have received, and complete the

Shortly after January 31, 2024, if you are selected to be one of the 100 corporate creditors that will receive a claim distribution in cryptocurrency, you will receive a communication with instructions for opening a Coinbase Prime account. If you are not selected, you will receive a communication confirming that you will receive your distribution in US Dollars, and you will receive specific instruction at a later date on how those funds distributed in US Dollars will be made available.

Please note that if you open a Coinbase Prime account **without** receiving notice that you have been selected to be one of the top 100 corporate creditors who will receive cryptocurrency, this will not have any effect on whether you will be allocated one of the 100 slots.

We are asking for your preference to ensure that each corporate creditor who is using up these limited 100 slots for cryptocurrency distributions actually wants to receive cryptocurrency. If you are indifferent between cash or cryptocurrency, please select cash so that corporate creditors who prefer cryptocurrency can use your slot.

Please review this message in its entirety and inform Celsius by email at CelsiusCreditorQuestions@kirkland.com of your preference by **January 23, 2024**, and we will be in touch with further information and instructions. If you do not contact us to indicate your preference to receive your distribution in cryptocurrency via Coinbase, your Claim distribution will be made in US Dollars, and specific instructions regarding your distribution will be provided to you at a later date.

If you have further questions about any of the above, you may contact CelsiusCreditorQuestions@kirkland.com.

Celsius

Best regards!

Read our FAQs and learn more from our Help Center <https://support.celsius.network/hc/en-us>

This email is a service from Celsius Network. Delivered by Zendesk

[R31Y96-ZK1J3]

[Celsius Network] Re: IMPORTANT: Celsius – Option for Corporate Creditors to Elect to Potentially Receive Distribution in Cryptocurrency

Celsius Network <support@celsius.network>

Fri, Jan 19, 2024 at 7:24 PM

Reply-To: Celsius Network <support@celsius.network>

To: "jake.faller.roth.ira@gmail.com" <jake.faller.roth.ira@gmail.com>

##- Please type your reply above this line -##

Your request ([#1396165](#)) has been updated. To add additional comments, reply to this email.**Customer Care and Loans Expert (Celsius Network)**

Jan 20, 2024, 03:24 UTC

Dear BFaller ROTH RD LLC,

This communication provides information about the distribution of cryptocurrency to you on account of Claims you may hold in the Celsius Chapter 11 proceedings. Please read the below in its entirety and timely provide Celsius with the information requested to complete the distribution of cryptocurrency to you on account of any such Claims.

You are receiving this communication because you have a claim (a "Claim") in the Chapter 11 proceedings of Celsius Network LLC and its debtor affiliates ("Celsius" or the "Debtors"), and you are one of the largest "corporate" creditors in this case.

Pursuant to the agreements the Debtors have with their distribution partners Coinbase and PayPal, the Debtors can only make distributions to 100 "corporate" creditors. A "corporate" creditor is any entity that is not an individual person (for example, a corporation, LLC, partnership, trust or similar entity). Whether a creditor qualifies as a "corporate" or "individual" creditor depends on Coinbase's policies and protocols.

As you may be aware, distributions pursuant to Celsius' modified Chapter 11 Plan of Reorganization [Docket No. 3577] (the "Plan") will commence on or around the Plan effective date (the "Effective Date"). **You are receiving this notification because you are one of the corporate creditors who has the largest claims against Celsius and, as such, you may have the opportunity to receive a cryptocurrency claim distribution through Coinbase.**

Celsius is reaching out to the corporate creditors with the largest claims to determine how to allocate these 100 slots. In order to be eligible to receive cryptocurrency, a corporate creditor must both:

- Affirmatively request to receive a distribution in cryptocurrency as described below by no later than **January 23, 2024**; AND
- If you have any Withdrawal Preference Exposure, elect to settle such Withdrawal Preference Exposure by no later than January 25, 2024 pursuant to the separate instructions you have received, and complete the

Shortly after January 31, 2024, if you are selected to be one of the 100 corporate creditors that will receive a claim distribution in cryptocurrency, you will receive a communication with instructions for opening a Coinbase Prime account. If you are not selected, you will receive a communication confirming that you will receive your distribution in US Dollars, and you will receive specific instruction at a later date on how those funds distributed in US Dollars will be made available.

Please note that if you open a Coinbase Prime account **without** receiving notice that you have been selected to be one of the top 100 corporate creditors who will receive cryptocurrency, this will not have any effect on whether you will be allocated one of the 100 slots.

We are asking for your preference to ensure that each corporate creditor who is using up these limited 100 slots for cryptocurrency distributions actually wants to receive cryptocurrency. If you are indifferent between cash or cryptocurrency, please select cash so that corporate creditors who prefer cryptocurrency can use your slot.

Please review this message in its entirety and inform Celsius by email at CelsiusCreditorQuestions@kirkland.com of your preference by **January 23, 2024**, and we will be in touch with further information and instructions. If you do not contact us to indicate your preference to receive your distribution in cryptocurrency via Coinbase, your Claim distribution will be made in US Dollars, and specific instructions regarding your distribution will be provided to you at a later date.

If you have further questions about any of the above, you may contact CelsiusCreditorQuestions@kirkland.com.

Celsius

Best regards!

Read our FAQs and learn more from our Help Center <https://support.celsius.network/hc/en-us>

This email is a service from Celsius Network. Delivered by Zendesk

[6V9N46-71NZV]

[Celsius Network] Re: IMPORTANT: Celsius – Option for Corporate Creditors to Elect to Potentially Receive Distribution in Cryptocurrency

Celsius Network <support@celsius.network>

Fri, Jan 19, 2024 at 7:20 PM

Reply-To: Celsius Network <support@celsius.network>

To: "sheri.faller.roth.ira@gmail.com" <sheri.faller.roth.ira@gmail.com>

##- Please type your reply above this line -##

Your request ([#1396164](#)) has been updated. To add additional comments, reply to this email.



Customer Care and Loans Expert (Celsius Network)

Jan 20, 2024, 03:20 UTC

Dear SFaller RD LLC,

This communication provides information about the distribution of cryptocurrency to you on account of Claims you may hold in the Celsius Chapter 11 proceedings. Please read the below in its entirety and timely provide Celsius with the information requested to complete the distribution of cryptocurrency to you on account of any such Claims.

You are receiving this communication because you have a claim (a "Claim") in the Chapter 11 proceedings of Celsius Network LLC and its debtor affiliates ("Celsius" or the "Debtors"), and you are one of the largest "corporate" creditors in this case.

Pursuant to the agreements the Debtors have with their distribution partners Coinbase and PayPal, the Debtors can only make distributions to 100 "corporate" creditors. A "corporate" creditor is any entity that is not an individual person (for example, a corporation, LLC, partnership, trust or similar entity). Whether a creditor qualifies as a "corporate" or "individual" creditor depends on Coinbase's policies and protocols.

As you may be aware, distributions pursuant to Celsius' modified Chapter 11 Plan of Reorganization [Docket No. 3577] (the "Plan") will commence on or around the Plan effective date (the "Effective Date"). **You are receiving this notification because you are one of the corporate creditors who has the largest claims against Celsius and, as such, you may have the opportunity to receive a cryptocurrency claim distribution through Coinbase.**

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Celsius

Best regards!

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This email is a service from Celsius Network. Delivered by Zendesk

[YK14N1-ME09K]

[Celsius Network] Re: IMPORTANT: Celsius – Option for Corporate Creditors to Elect to Potentially Receive Distribution in Cryptocurrency

Celsius Network <support@celsius.network>

Fri, Jan 19, 2024 at 6:54 PM

Reply-To: Celsius Network <support@celsius.network>

To: "sheri.faller.trad.ira@gmail.com" <sheri.faller.trad.ira@gmail.com>

##- Please type your reply above this line -##

Your request ([#1396134](#)) has been updated. To add additional comments, reply to this email.**Customer Care and Loans Expert (Celsius Network)**

Jan 20, 2024, 02:54 UTC

Dear SFaller TRD RD LLC,

This communication provides information about the distribution of cryptocurrency to you on account of Claims you may hold in the Celsius Chapter 11 proceedings. Please read the below in its entirety and timely provide Celsius with the information requested to complete the distribution of cryptocurrency to you on account of any such Claims.

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Celsius

Best regards!

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[1ERGXG-R9G7E]